

Message

From: Casso, Ruben [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=E33DF0ABBBF049959E9100E556C7E634-CASSO, RUBEN]
Sent: 9/30/2021 8:07:22 PM
To: Verhalen, Frances [verhalen.frances@epa.gov]
Subject: RE: Discrepancy in Sasol's EO emissions

I checked the 2014 NATA information online and found the Sasol EtO emission number to be 6.3198945 tpy = 12, 640 lbs

I'm checking on what info I can find from LDEQ and Sasol on 2014 emissions now

From: Verhalen, Frances <verhalen.frances@epa.gov>
Sent: Thursday, September 30, 2021 2:34 PM
To: Casso, Ruben <Casso.Ruben@epa.gov>
Subject: FW: Discrepancy in Sasol's EO emissions

Any truth to this?

Frances Verhalen, P.E., Chief
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From: Terrell, Kimberly A <kterrell1@tulane.edu>
Sent: Thursday, September 30, 2021 2:01 PM
To: Verhalen, Frances <verhalen.frances@epa.gov>
Cc: Tejada, Matthew <Tejada.Matthew@epa.gov>; Jordan, Lisa W <lwjordan@tulane.edu>; Vaughn, Gloria <Vaughn.Gloria@epa.gov>
Subject: Discrepancy in Sasol's EO emissions

Dear Frances Verhalen,

We are looking forward to the EPA meeting tonight RE Sasol. However, there is a major discrepancy in the ethylene oxide data that EPA Region 6 provided in its draft presentation. As you are aware, in Oct 2019, Sasol submitted recalculated ethylene oxide emissions for 2014-2018. However, EPA's graph uses the original reported value (12,640 lbs) for 2014, followed by the recalculated values (~2,000 lbs) for 2017-2018, in an apparent attempt to portray an emissions reduction.

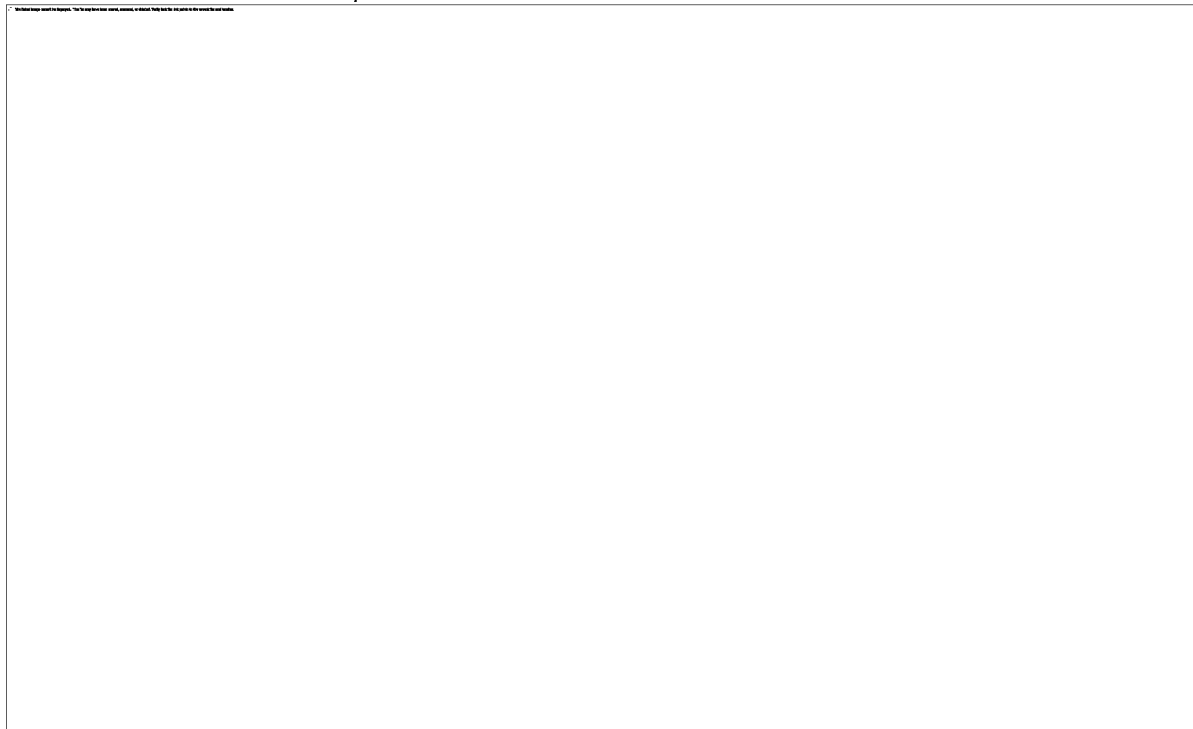
Because it combines original and recalculated data in a graph that purports to portray temporal trends, EPA's approach is blatantly misleading. We request that this graph be corrected to show Sasol's recalculated emissions for 2014-2020 (including 2015 and 2016, which were omitted from the Powerpoint). If EPA intends to present the original emissions values, these values should be presented as a separate data series.

I have included the slide in question below, along with a corrected version, based on Sasol's recalculated 2014 emissions data. Please feel free to follow up with any questions. We are sincerely looking forward to the opportunity to meet with you tonight.

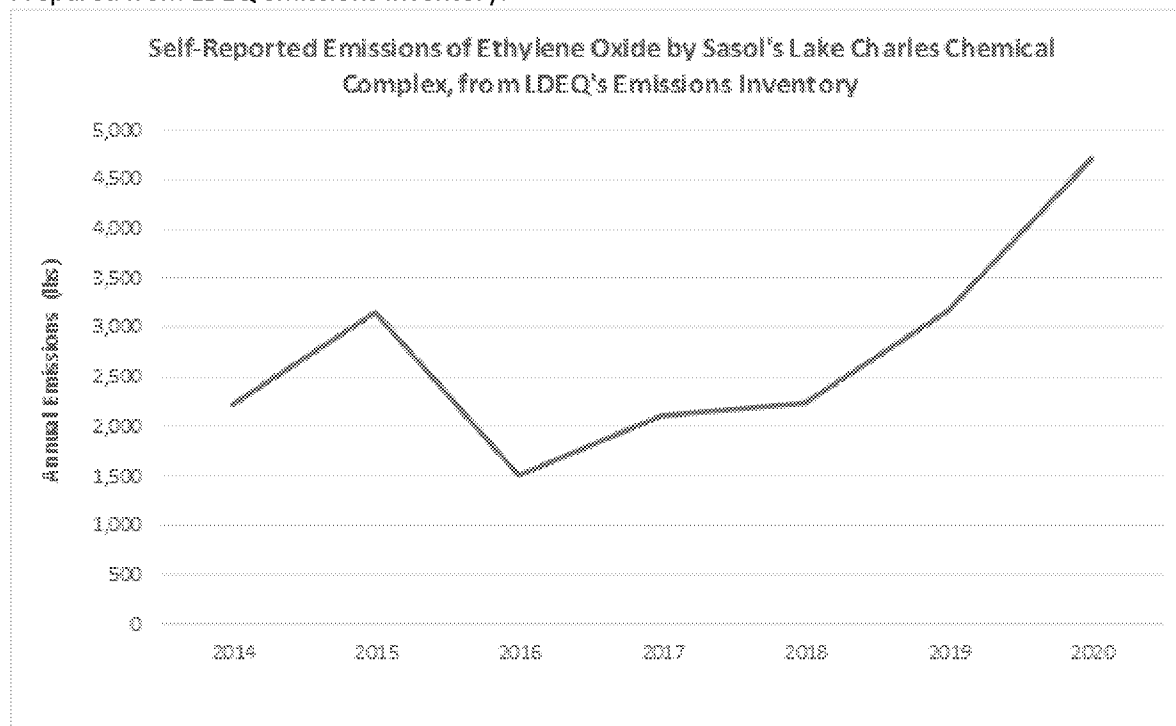
Warmly,

Kim

From slide 19 of EPA's Powerpoint:



Prepared from LDEQ emissions inventory:



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